

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re: Chapter 9

City of Detroit, Michigan,

Case No. 13-53846
Debtor. Hon. Steven W. Rhodes

**PETITIONERS' RESPONSE TO RESPONDENTS' MOTION TO STAY THE EFFECT
OF ORDER GRANTING PHILLIPS' MOTION FOR RELIEF FROM STAY (DKT. 1536)
PENDING APPEAL OF THAT ORDER AND ORDER DENYING MOTION FOR
RECONSIDERATION OF ORDER GRANTING PHILLIPS' MOTION FOR RELIEF
FROM STAY (DKT. 2256)**

NOW COME Petitioners, (Plaintiffs in *Catherine Phillips, et. al v. Snyder, et. al*, Case No. 13-cv-11370, filed in the United States District Court for the Eastern District of Michigan (the "*Phillips Case*")) by and through their attorneys and, respond to the Governor and Treasurer's Motion under Fed. R. Bankr. P. 8005 to stay this Court's Order Granting Petitioners' Motion for Relief from Stay (Dkt. #1536-1) pending appeal by the Governor, Treasurer and Debtor from such Order. In opposition to that Motion, Petitioner's state:

1. Respondents have failed to even arguably meet the criteria for issuance of a stay pending appeal.

For the reasons stated in the accompanying brief, Petitioners respectfully request that this Honorable Court deny Respondent's Motion herein to stay the effect of its November 6, 2013 Order (Dkt. #1536-1) pending appeal of that Order and this Court's Order denying Respondents' Motion for Reconsideration (Dkt. #2256).

Dated: January 24, 2014

Respectfully submitted,
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